

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

BRADLEY ESTEY,	)	
	)	
Plaintiff,	)	
	)	Civil Action File
v.	)	No.
	)	
ADT LLC,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL OF CIVIL ACTION**

Defendant ADT LLC, through its undersigned counsel, now removes this civil action to this Court pursuant to 28 U.S.C. § 1441(a), and states:

1. ADT LLC, the nation's oldest and largest supplier of electronic alarm systems, is the only defendant in this civil action. Plaintiff Bradley Estey's "First Amended Complaint," filed in the Superior Court of DeKalb County, State of Georgia, Case Number 16CV7710, is dated July 15, 2015. ADT was served with a summons and a copy of the complaint on July 28, 2016. A copy of the summons and complaint is attached as an Exhibit to this Notice.

2. This action, pled individually and on behalf of a nationwide class of consumers, seeks injunctions, compensatory and punitive damages, and attorney fees arising from alleged violations of the Telephone Consumer Protection Act, 47 U.S.C. § 227(b).

### TIMELINESS OF REMOVAL

3. Removal is timely under 28 U.S.C. § 1446(b)(1). ADT was served on July 28, 2015.

### BASIS FOR JURISDICTION

4. This Court has original federal question jurisdiction over this action pursuant to 28 U.S.C. § 1331.

5. The complaint presents a federal question because it seeks relief under the Telephone Consumer Protection Act, 47 U.S.C. § 227(b), a law of the United States.

### NO CONSENT FROM CODEFENDANTS REQUIRED

6. ADT is the sole defendant. No party's consent to removal is required.

WHEREFORE, defendant ADT LLC now removes Case Number 16CV7710 from the Superior Court of DeKalb County, State of Georgia, to this Court.

Dated: August 25, 2016

THE GODSEY FIRM LLC

/s/ J. Gregory Godsey\_\_\_\_\_

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*Counsel for Defendant ADT LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 25<sup>th</sup> day of August, 2016, the foregoing was presented to the Clerk of Court for filing and uploading to the CM/ECF system, and for service upon the following counsel of record:

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This 25<sup>th</sup> day of August, 2016.

/s/J. Gregory Godsey\_\_\_\_\_  
J. GREGORY GODSEY